

**DECLARATION OF ALBERT FLOWERS**

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3 1. My name is Albert Flowers. I have personal knowledge of the facts  
4 contained in this declaration, and if called to testify, I could and would testify  
5 competently as to the truth of the facts in this declaration.

6 2. I am 61 years old. I was born in the Virgin Islands but moved to the  
7 United States when I was 14. I have lived in Los Angeles for the past 47 years.

8 3. I am currently homeless and live in a tent on 43<sup>rd</sup> Street and Flower, in  
9 South Los Angeles. I have been homeless for about a year. I lost my housing after  
10 my wife and mother died, and I fell on hard times.

11 4. I try and stay out of the way, on a sidewalk where a lot of people don't  
12 come by. It's right near the freeway, so the noise is loud, but there are other homeless  
13 people around.

14 5. There is a lot of illegal dumping that happens on the street where I stay. I  
15 try to stop people from dumping stuff on the street, but it doesn't work sometimes.  
16 When people dump their stuff, the trash just sits there. There are no trashcans  
17 anywhere around, so the trash just piles up.

18 6. In December 2019, I was staying in my tent on Flower near 43<sup>rd</sup> St. It  
19 was really rainy at the end of December. My tent was set up on the sidewalk on  
20 pallets to help keep my belongings dry. I found the pallets dumped on the street. The  
21 pallets let water run out of my tent and down the street, so the water doesn't pool in  
22 my tent, which is really useful, especially after the rain stops. But my belongings still  
23 got wet.

24 7. On the morning of around December 27, 2019, City workers came to my  
25 tent and told me I had 10 minutes to pack up my tent. I knew they were city workers  
26 because they had on city vests and had a green trash truck with them that has the City  
27 name on the side. They have come and done cleanups before so I know they work for  
28 the city. I did not see any notices for the cleanup that day. I had seen notices for a

1 cleanup a few days before, but it was raining and they did not do the cleanup. So  
2 when they came that morning I didn't expect them.

3 8. I tried my best to pack up and move, but it was very hard for me to pack  
4 up so quickly. I have a hernia and it is difficult to move my belongings. Sleeping on  
5 the pallets also makes me stiff in the morning. So I moved as fast as I could.

6 9. I tried to tell the sanitation workers that I needed more time, but when I  
7 tried to tell them that, they said I was interfering and that they were going to call the  
8 LAPD. I was not able to get any of my belongings. Instead, the sanitation workers  
9 started going through my things. They ripped my tent and threw it away, along with  
10 all of my belongings like my clothes, my bedding, and other things. They also threw  
11 away the pallets. They threw away everything I had. Included in my belongings were  
12 my mother's ashes.

13 10. After they took my tent, I had to stay out in the cold, without a tent until I  
14 could find a new one. It took me a while to replace my clothes and bedding. I can't  
15 replace my mother's ashes.

16 11. Right now, I have a tent, and I found some more pallets that I have my  
17 tent on to keep it off the ground. I also use a couple of pallets to put a barrier up  
18 around my tent, which helps keep my tent up and keeps me safe at night.

19 12. The pallets I use to keep the tent propped up are about the same size as  
20 the ones under my tent. One of the pallets measures 39" x 47" x 5 1/4". The other  
21 pallet measures 44 1/2" x 38 1/2" x 5 1/4". There's another pallet that was dumped by the  
22 building next door, that I don't use, and it measures 36" x 36" x 5". I know the  
23 measurements of the pallets because I helped to measure them.

24 13. I would move the pallet that was dumped on the sidewalk near me to a  
25 dumpster, if there was a place to put it, but there is no designated place to put our  
26 trash, and often, when the city comes to do cleanups, they take the trash that is next to  
27 tents and people's belongings that are unattended, but they leave the piles of trash  
28 behind.

14. The City puts up notices a lot and doesn't do the cleanups. Probably four or five times before my belongings were taken, the City put up notices and I moved out of the way, but they didn't come to do the cleanup. I had to move back to my spot, with all the trash still in the area.

15. I have heard on the radio that there is a new virus that is making people sick. They put one handwashing station on the corner of 43<sup>rd</sup> St. and Flower. There are very few people in the area. There are a lot more people on 42<sup>th</sup> St. I am the only one who stays in my area, and there is only one person who stays on 43<sup>rd</sup> street, near the handwashing station.

16. If I were offered a place in a shelter, I am worried that I would have to be by a lot of people and it would make it more likely that I would get sick. Because I'm already sick and have a hard time getting around, I am trying to stay away from people in my tent, and I couldn't do that in a shelter.

17. If there were hotel rooms, and I was the only person in the room, away from other people, I would feel safer and it would be easy for me to come inside.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 20, 2020 in Los Angeles, California

Albert Flowers